

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

<b>IN RE:</b>	:	<b>CHAPTER 13</b>
<b>CHERIE LYNISE IRBY</b>	:	
<b>fka Cherie Lynise Jackson</b>	:	<b>CASE NO. 1:14-bk-05756</b>
<b>Debtor</b>	:	
	:	
<b>US BANK NATIONAL ASSOCIATION,</b>	:	
<b>as Trustee for NRZ Pass-Through Trust</b>	:	
<b>IV,</b>	:	
<b>Movant</b>	:	
	:	
<b>v.</b>	:	
	:	
<b>CHERIE LYNISE IRBY</b>	:	
<b>fka Cherie Lynise Jackson,</b>	:	
<b>Respondent</b>	:	

**ANSWER TO MOTION FOR RELIEF FROM STAY**

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Proof of default is demanded at trial and this averment is therefore denied.
7. Proof of default is demanded at trial and this averment is therefore denied.
8. Movant has failed to satisfy all of the elements of Bankruptcy Code § 506(b) and allegations that the Debtor is responsible for payment of attorney fees and costs are therefore denied.
9. Admitted.
10. Movant has failed to satisfy all of the elements of Bankruptcy Code § 506(b) and allegations that the Debtor is responsible for payment of attorney fees and costs are therefore denied.

WHEREFORE, the Debtor respectfully requests that this Court deny the motion for relief filed by the Movant and grant such other relief as this Court deems just.

Respectfully submitted,

/s/ Dorothy L. Mott

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